

114-16



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

ENTERED



OFFICE OF  
AIR AND RADIATION

Mr. Sean Dunagan, Acting Manager  
Carlsbad Field Office  
U.S. Department of Energy  
P.O. Box 3090  
Carlsbad, New Mexico 88221-3090

Dear Mr. Dunagan:

The U. S. Environmental Protection Agency (EPA) is continuing to review the Department of Energy's (DOE's) CRA-2014 performance assessment (PA). As you know, during the EPA/DOE Technical Exchange Meeting held in Albuquerque, New Mexico, on August 31 and September 1, 2016, EPA and DOE mutually agreed to a number of tasks or action items with specific due dates in order to facilitate EPA's review of DOE's CRA-2014. Since then a number of unique developments have arisen, in the form of rock falls and other physical changes to the repository itself, which have resulted in DOE's decision to alter the planned structure/footprint of the Waste Isolation Pilot Plant (WIPP).

In furtherance of EPA's review of the CRA-2014 PA, EPA requests that the DOE perform a limited sensitivity study using the following modifications to the CRA-2014 PA inputs:

- a) Use the Data0.FM1 chemistry database with the uncertainty distribution for actinide solubility developed with the references EPA provided to DOE via letter dated September 30, 2016,
- b) For the PBRINE parameter please see the EPA developed distribution previously provided to DOE via email from Tom Peake dated September 16, 2016,
- c) For the TAUFAIL parameter, the lower bound of the sampled distribution for the 50% degraded waste will be 1.60 MPa,
- d) For spallings releases use version 1.22 of the DRSPALL code where the errors in the *Forchterm* have been corrected, and
- e) The correct representative length of the furthest northern set of panel closures, which is almost double of what was modeled in the CRA-2014 PA.

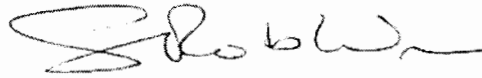
The results for all release mechanisms should be presented graphically as mean Complementary Cumulative Distribution Functions with lower and upper 95% confidence intervals. Additionally, please provide a summary table that lists the mean, lower and upper 95% confidence intervals for the individual and total releases. All results presented need to be compared with that of the CRA-2014 PA.



Please provide this information to EPA in a summary report by December 16, 2016. EPA plans to proceed to a completeness determination, and then a final recertification decision, following DOE's submittal of the above referenced summary report.

If you have any questions concerning this request, please have your staff contact Kathleen Economy at (202) 343-9844 or [economy.kathleen@epa.gov](mailto:economy.kathleen@epa.gov).

Sincerely,



Jacqueline Robles Werner  
Acting Director  
Radiation Protection Division

cc: Electronic Distribution  
Todd Shrader, DOE/CBFO  
George Basabilvazo, DOE/CBFO  
Russ Patterson, DOE/CBFO  
Frank Marcinowski, DOE/HQ  
Betsy Forinash, DOE/HQ  
Alton Harris, DOE/HQ  
Ricardo Maestas, NMED  
Nick Stone, EPA Region 6  
EPA WIPP Team  
EPA WIPP Docket